

Exhibit 21

1
2 UNITED STATES DISTRICT COURT
3 SOUTHERN DISTRICT OF NEW YORK
4 06 Civ. 0589 (CGE)

5 -----x
6 ANUCHA BROWNE-SANDERS,

7
8 Plaintiff,

9
10 - against -

11 MADISON SQUARE GARDEN, L.P., ISIAH LORD
12 THOMAS, III, and JAMES DOLAN,
13 Defendants.

14 -----x
15
16 January 19, 2007
17 10:01 a.m.

18
19 Videotaped Deposition of KARIN
20 BUCHHOLZ, taken by Plaintiff, pursuant to
21 Notice, held at the offices of Vladeck
22 Waldman Elias & Engelhard, P.C., 1501
23 Broadway, New York, New York, before Todd
24 DeSimone, a Registered Professional
25 Reporter and Notary Public of the State of
New York.

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1 **BUCHHOLZ**

2 **Q.** Did you work with Faye Brown?

3 **A.** Yes.

4 **Q.** How would you describe your

5 working relationship with Faye Brown?

6 MR. GREEN: Same objection.

7 You may answer.

8 **A.** My working relationship with

9 Faye Brown was very good, excellent, until

10 the time where she applied for a position

11 that Alexia Katsaounis vacated and did not

12 get the job and after that our

13 relationship was not as strong.

14 **Q.** And when did she apply for the

15 job that Alexia vacated?

16 **A.** When Alexia left. I'm not sure

17 when that was. She is now in her second

18 year of B school. I guess about a year

19 and a half ago.

20 **Q.** And this was a position for

21 your assistant?

22 **A.** I think Alexia was promoted to

23 coordinator. So it was a coordinator,

24 replacing the coordinator position.

25 **Q.** And what role, if any, did you

123

1 **BUCHHOLZ**

2 have in determining who would be Alexia's

3 replacement?

4 **A.** In that particular case I had a

5 lot of control over who would be Alexia's

6 replacement.

7 **Q.** And why did you not give Faye

8 Brown the job?

9 **A.** I thought other people had more

10 of the qualities and the skills that I was

11 looking for for that position.

12 **Q.** Who did you put in that

13 position?

14 **A.** Artie Bayes.

15 **Q.** And what position had he been

16 in before?

17 **A.** He was my intern.

18 **Q.** In what way did the

19 relationship -- strike that.

20 In what way was the

21 relationship not as strong after you did

22 not give her the coordinator position?

23 **A.** She didn't talk to me for a

24 while. She was visibly angry and upset

25 and she didn't talk to me. Then we got to

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1 **BUCHHOLZ**

2 be on a more talking basis and then it was

3 more cordial and it got better, but it was

4 never like it was before that.

5 **Q.** Did you ever tell anyone that

6 you saw Anucha Browne-Sanders be visibly

7 upset after she interacted with Isiah

8 Thomas?

9 MR. GREEN: Objection to form.

10 You may answer.

11 **A.** Did I ever tell anyone?

12 **Q.** That you observed Anucha

13 Browne-Sanders as visibly upset after she

14 interacted with Isiah Thomas.

15 **A.** I don't remember.

16 **Q.** Did you ever see it?

17 **A.** Did I ever see that she was

18 visibly upset?

19 **Q.** Correct.

20 **A.** I did see her, but I don't

21 remember if I told anyone that I saw that

22 she was visibly upset.

23 **Q.** When did you see her visibly

24 upset after interactions with Mr. Thomas?

25 MR. GREEN: Objection to form.

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1 **BUCHHOLZ**

2 You may answer.

3 **A.** It is very fuzzy. I'm not

4 exactly sure of when it was.

5 **Q.** On how many occasions did you

6 see her visibly upset?

7 **A.** Let me think. Three or four.

8 **Q.** Do you remember any of the --

9 strike that.

10 Were you aware as to why she

11 was visibly upset? Did she tell you?

12 **A.** I clearly remember two. One

13 was -- yes, I clearly remember two.

14 **Q.** And what were those incidences?

15 **A.** One was in December, I think,

16 of '05 where she said -- she told me that

17 he had tried to put his arm around her and

18 she said -- and he said "Why aren't you

19 showing me any love?" And she didn't seem

20 like really upset about that. She was

21 more like shocked, like how dare he do

22 that, how dare he -- you know, he knows we

23 are not getting along, how dare he put his

24 arm around me and tell me I'm not showing

25 him any love. So if you want to call that

32 (Pages 122 to 125)

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<p style="text-align: right;">126</p> <p>1 BUCHHOLZ</p> <p>2 visibly upset.</p> <p>3 The other time I remember was</p> <p>4 earlier than that. And I don't remember</p> <p>5 the exact time frame. But he had -- she</p> <p>6 said "Karin, can you believe this? I was</p> <p>7 standing in Gate 1 and Isiah came up to me</p> <p>8 and his wife was just feet away, a few</p> <p>9 feet away, and he said" -- you know, kind</p> <p>10 of like with this epiphany, she didn't say</p> <p>11 that, I'm saying that -- "Now I know why</p> <p>12 we don't get along. I think I'm in love</p> <p>13 with you."</p> <p>14 She again, when she was</p> <p>15 recounting that incident, she said that,</p> <p>16 you know, she was shocked that he could</p> <p>17 say something like that with his wife a</p> <p>18 few feet away. And it was like she was</p> <p>19 offended in a way that, you know, he could</p> <p>20 try to charm her. She knows that they</p> <p>21 don't get along and he is trying to be</p> <p>22 sweet to her or trying to suck up to her</p> <p>23 in a way.</p> <p>24 Q. When did Ms. Browne-Sanders</p> <p>25 tell you about the incident at Gate 1?</p>	<p style="text-align: right;">128</p> <p>1 BUCHHOLZ</p> <p>2 day, very soon after Isiah had gotten to</p> <p>3 the Garden, accepted the position, she</p> <p>4 went to have a meeting with him and was</p> <p>5 bringing him this sort of cheat sheet that</p> <p>6 had some sort of basic business, top-line</p> <p>7 business information, how many tickets</p> <p>8 sold, you know, what our rank was I guess</p> <p>9 in the NBA, what merchandise, just basic</p> <p>10 numbers, business numbers.</p> <p>11 She had given one of those</p> <p>12 cheat sheets to all of the people that</p> <p>13 reported to her so that we would always</p> <p>14 have that information if we needed it.</p> <p>15 She brought this cheat sheet to him and</p> <p>16 she said that at the meeting he had said</p> <p>17 "If you do all of this, what the fuck do I</p> <p>18 do?" Or something to that effect. I</p> <p>19 don't remember in detail.</p> <p>20 Q. Have you ever heard Isiah</p> <p>21 Thomas curse?</p> <p>22 A. I have.</p> <p>23 Q. On how many occasions?</p> <p>24 A. Twice that I clearly remember.</p> <p>25 Q. And what were those two</p>
<p style="text-align: right;">127</p> <p>1 BUCHHOLZ</p> <p>2 A. It is a little -- I'm not</p> <p>3 sure -- well, I know for sure she told me</p> <p>4 it around November and December of '05.</p> <p>5 There was a time where she was telling me</p> <p>6 a lot of things, refreshing my memory of</p> <p>7 things that she had told me about Isiah,</p> <p>8 about the Garden, about all of the things</p> <p>9 that she was complaining about overall,</p> <p>10 leading up to when she wanted to get a</p> <p>11 lawyer, including interactions with Steve</p> <p>12 Mills and others.</p> <p>13 Q. Now, you say she was refreshing</p> <p>14 your memory. Did she tell you about the</p> <p>15 incident at Gate 1 prior to November or</p> <p>16 December of '05?</p> <p>17 A. Yes.</p> <p>18 Q. What other things did she tell</p> <p>19 you that you recall?</p> <p>20 A. In November?</p> <p>21 Q. Whatever she told you that</p> <p>22 refreshed your recollection. And if you</p> <p>23 recall when she originally told you.</p> <p>24 A. For sure she refreshed my</p> <p>25 memory in November about being -- that one</p>	<p style="text-align: right;">129</p> <p>1 BUCHHOLZ</p> <p>2 occasions?</p> <p>3 A. Once we were in an upfront</p> <p>4 meeting with ad sales guys,</p> <p>5 representatives, men and women, and he</p> <p>6 said that he would make himself available</p> <p>7 to go to clients but don't fucking waste</p> <p>8 his time. Something like "Don't fucking</p> <p>9 waste my time if it is something that is</p> <p>10 bullshit." Something to that effect. And</p> <p>11 everyone laughed.</p> <p>12 Then the second time, I think</p> <p>13 it was -- maybe it was three times. I</p> <p>14 remember one time where I think it was a</p> <p>15 state of the team address to employees and</p> <p>16 he said some curse. But it was, you know,</p> <p>17 like, I can't remember the context, but,</p> <p>18 again, everyone laughed. It was a fuck</p> <p>19 word. So I'm not even 100 percent sure</p> <p>20 about that one. So forget that one.</p> <p>21 Q. Are there any others that you</p> <p>22 recall specifically?</p> <p>23 A. No.</p> <p>24 Q. What else did you and</p> <p>25 Ms. Browne-Sanders discuss in November '05</p>

33 (Pages 126 to 129)

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1 **BUCHHOLZ**

2 that refreshed your recollection of things

3 that she had told you earlier?

4 A. She said there was a time that

5 -- she said there was a time that she

6 met -- that she had a meeting with Steve

7 Mills and Isiah and in November -- this

8 one is much more shaky for me as far as

9 clear.

10 But in November she definitely

11 said that she was in this meeting with

12 Steve Mills and Isiah to clarify their

13 roles and when Steve Mills left she said

14 that Isiah had cursed at her. Then when

15 he came back, he stopped.

16 Q. "When he came back," meaning

17 when Steve Mills came back?

18 A. When Steve Mills came back,

19 yes.

20 Q. Anything else you can recall

21 her refreshing your recollection about in

22 November of '05?

23 A. Just about Isiah, interactions

24 with, or about anything?

25 Q. Well, any issues that you

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1 **BUCHHOLZ**

2 recall in November of '05, her reminding

3 you about that she had told you about

4 earlier.

5 MS. EISENBERG: Objection as to

6 form.

7 Q. You can answer.

8 A. Everything that she told me in

9 November, you are asking that she

10 refreshed my memory, you would like to

11 know?

12 Q. Well, you described earlier

13 that there were certain conversations that

14 had occurred prior to November of '05 that

15 she and you were talking about in November

16 of '05 and that she refreshed your

17 recollection. Any that you remember?

18 A. Yes. She reminded me of a

19 meeting -- oh, of a time with the parking

20 forgeries with Hassan and Vernon that she

21 had been asked -- she said that someone

22 asked her to sign a Sarbanes-Oxley

23 document stating that she didn't know of

24 any fraudulent activity that was taking

25 place under her watch and that she didn't

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1 **BUCHHOLZ**

2 want to sign that and she said that

3 someone above her asked her to sign it and

4 she asked that person if they could send

5 her an e-mail making that request and that

6 person said no. So she went ahead and

7 documented that she knew of these two

8 fraudulent activities.

9 Then we talked about it in

10 November that that was -- then she had

11 another -- she had a budget meeting with

12 Jim Dolan and Steve Mills and some other

13 people that were in this budget meeting,

14 all men, and she said that she got reamed

15 by Jim Dolan and in her words, she used

16 this phrase a lot, boiled the ocean on

17 these courts, these purchase courts, for a

18 program that was under my area, Dan

19 Gladstone's purchase courts for this

20 program called Last Man Standing.

21 She said that was a program

22 that Steve Mills had asked Dan to do and

23 was so upset that Steve didn't have her

24 back. She used that phrase a lot too,

25 that Steve didn't have her back. And that

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1 **BUCHHOLZ**

2 Jim Dolan -- she really felt the reason

3 she got so hammered in that meeting over

4 \$40,000 was because she was a

5 whistleblower. So that was -- those were

6 two incidences.

7 Q. Before you go on to the next,

8 at or about the time in November of '05,

9 what was your working relationship with

10 Ms. Browne-Sanders?

11 MR. GREEN: Objection to form.

12 You may answer.

13 Q. Excellent? Very good? Good?

14 A. Oh, yes, excellent, very good,

15 yes.

16 Q. Did you tell her at that time

17 that you had her back?

18 A. Often. Because she required

19 that of anyone who worked for her. She

20 often drilled that into us that loyalty,

21 having her back, was very important. It

22 was very clear to us that we needed to

23 have her back under all circumstances.

24 And people that didn't have her back were

25 no longer there.

<p style="text-align: right;">134</p> <p>1 BUCHHOLZ</p> <p>2 Q. Did you believe that she had</p> <p>3 your back?</p> <p>4 A. I did.</p> <p>5 Q. Did she at any point tell you</p> <p>6 that she had previously believed that</p> <p>7 Steve Mills had her back?</p> <p>8 A. Yes.</p> <p>9 Q. And had she told you at any</p> <p>10 point that she had Steve Mills' back?</p> <p>11 A. Yes.</p> <p>12 Q. So the record is clear, having</p> <p>13 somebody's back means loyalty or something</p> <p>14 else? What does it mean to you?</p> <p>15 MR. GREEN: Objection to form.</p> <p>16 You may answer the question.</p> <p>17 A. What I interpret it to mean,</p> <p>18 and I don't know how any other person</p> <p>19 would interpret it, is that you are loyal,</p> <p>20 that when push comes to shove you stand by</p> <p>21 them, and that you will take a hit for</p> <p>22 them. You'll protect them. You'll stick</p> <p>23 up for them. That's kind of what I</p> <p>24 interpreted it to mean.</p> <p>25 MS. VLADECK: I think we have</p>	<p style="text-align: right;">136</p> <p>1 BUCHHOLZ</p> <p>2 needed immediate attention and Judge Lynch</p> <p>3 was tied up and he was asking if I could</p> <p>4 deal with whatever the situation was</p> <p>5 today.</p> <p>6 I do not know if this matter</p> <p>7 will be referred to me for any purpose</p> <p>8 other than dealing with whatever is</p> <p>9 currently causing you to be at odds at</p> <p>10 today's deposition. But you are going to</p> <p>11 have to do some educating of me to bring</p> <p>12 me up to speed if there has been any prior</p> <p>13 contact with the court on whatever issue</p> <p>14 there may be that is causing you problems</p> <p>15 today.</p> <p>16 MS. VLADECK: Your Honor, this</p> <p>17 is Anne Vladeck. If I can try and bring</p> <p>18 you up to speed on this particular issue.</p> <p>19 The plaintiff in this case,</p> <p>20 Anucha Browne-Sanders, came to the Vladeck</p> <p>21 Waldman law offices before she filed her</p> <p>22 lawsuit with another employee of the</p> <p>23 Garden, Karin Buchholz, who is being</p> <p>24 deposed now. There is a dispute as to</p> <p>25 whether or not Ms. Buchholz came in order</p>
<p style="text-align: right;">135</p> <p>1 BUCHHOLZ</p> <p>2 to call the magistrate judge in about five</p> <p>3 minutes. I wouldn't mind a short break</p> <p>4 before then.</p> <p>5 THE VIDEOGRAPHER: We are off</p> <p>6 the record. The time is 2:20.</p> <p>7 (Recess taken.)</p> <p>8 (The following portion is from</p> <p>9 a conference call with U.S. Magistrate</p> <p>10 Judge Debra Freeman.)</p> <p>11 THE COURT: I know nothing</p> <p>12 about any dispute that you are having.</p> <p>13 The sum total of what I know about this</p> <p>14 case, other than that I suspect it may</p> <p>15 have been a case in the news, I'm not sure</p> <p>16 about that, is that right, has this been</p> <p>17 in the news?</p> <p>18 MR. GREEN: Yes, it has, your</p> <p>19 Honor.</p> <p>20 THE COURT: I suspect I have</p> <p>21 heard something along the way. The only</p> <p>22 thing I know about discovery in this case</p> <p>23 is I got a call today from Judge Lynch's</p> <p>24 clerk saying you were at a deposition,</p> <p>25 there was an issue that had come up that</p>	<p style="text-align: right;">137</p> <p>1 BUCHHOLZ</p> <p>2 to address her own issues, related issues,</p> <p>3 similar issues, identical issues as the</p> <p>4 plaintiff, or whether she came simply to</p> <p>5 support or aid the plaintiff.</p> <p>6 We have understood that,</p> <p>7 according to Mr. Green, the deponent has</p> <p>8 waived her privilege with respect to any</p> <p>9 conversations with counsel. The</p> <p>10 defendants sought the notes of the lawyers</p> <p>11 of the meetings with counsel saying that</p> <p>12 Ms. Buchholz waived the privilege and</p> <p>13 therefore they were entitled to all the</p> <p>14 notes of the meetings. Judge Lynch denied</p> <p>15 their motion and said they were not</p> <p>16 entitled to the notes of the meetings.</p> <p>17 We have understood that, as I</p> <p>18 said, that Ms. Buchholz waived her</p> <p>19 privilege. We believe it is relevant to</p> <p>20 know the circumstances of the waiver,</p> <p>21 whether it was under duress or not. This</p> <p>22 is in major part a retaliation case</p> <p>23 against the Garden.</p> <p>24 THE COURT: Hang on a second.</p> <p>25 I want to make sure I've got the parties</p>

35 (Pages 134 to 137)

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Exhibit 22

1
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5 -----x
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9

10 MADISON SQUARE GARDEN, L.P., ISIAH LORD
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12 Defendants.
13 -----x

14 February 12, 2007
15 10:10 a.m.

16 Videotaped Deposition of JOSEPH
17 FAVORITO, taken by Plaintiff, pursuant to
18 Notice, held at the offices of Vladeck
19 Waldman Elias & Engelhard, P.C., 1501
20 Broadway, New York, New York, before Todd
21 DeSimone, a Registered Professional
22 Reporter and Notary Public of the State of
23 New York.
24
25

<p>82</p> <p>1 FAVORITO</p> <p>2 speak to anyone about what he viewed as</p> <p>3 their inappropriate dress?</p> <p>4 A. No.</p> <p>5 Q. Did you ever hear Mr. Thomas</p> <p>6 speak on the subject of the general</p> <p>7 malaise of the way people were dressing at</p> <p>8 the practice facility?</p> <p>9 A. Yes, in general, yes.</p> <p>10 Specifically Isiah's phrase is "You</p> <p>11 play" -- I have to remember specifically.</p> <p>12 But it was always about conducting</p> <p>13 yourself in a specific manner.</p> <p>14 Q. Did Mr. Thomas use profanity in</p> <p>15 any of those comments?</p> <p>16 A. I don't recall him -- I don't</p> <p>17 recall specific instances of him</p> <p>18 discussing that with anyone.</p> <p>19 "You play the way you live."</p> <p>20 Q. So you recall generally seeing</p> <p>21 him or hearing him speak to people about</p> <p>22 this, but you don't remember exactly what</p> <p>23 he said; is that fair to say?</p> <p>24 A. That's fair to say.</p> <p>25 Q. Has anyone ever told you that</p>	<p>84</p> <p>1 FAVORITO</p> <p>2 your mind?</p> <p>3 A. No.</p> <p>4 Q. Do you recall anything that</p> <p>5 Ms. Browne-Sanders said to Mr. Thomas or</p> <p>6 that he said to her in those interactions?</p> <p>7 A. Nothing. Nothing outstanding</p> <p>8 that I can think of.</p> <p>9 Q. Did you ever see Mr. Thomas hug</p> <p>10 Ms. Browne-Sanders?</p> <p>11 A. I don't recall it.</p> <p>12 Q. Have you ever seen Mr. Thomas</p> <p>13 hug other women who work at the Garden?</p> <p>14 A. Yes.</p> <p>15 Q. Who?</p> <p>16 A. Raquel Burnette.</p> <p>17 Q. That's his niece, right?</p> <p>18 A. Yes.</p> <p>19 Q. Anyone else?</p> <p>20 A. Karin Buchholz. I can't think</p> <p>21 of anyone else.</p> <p>22 Q. What was the context of</p> <p>23 Mr. Thomas hugging Ms. Buchholz? Was that</p> <p>24 in greeting?</p> <p>25 A. Greeting, yes.</p>
<p>83</p> <p>1 FAVORITO</p> <p>2 Mr. Thomas had been angry or hostile</p> <p>3 towards them?</p> <p>4 A. Not that I can recall.</p> <p>5 MR. MINTZER: We have to change</p> <p>6 the tape, so why don't we take a</p> <p>7 five-minute break.</p> <p>8 THE VIDEOGRAPHER: The time is</p> <p>9 11:32 a.m. We are off the record.</p> <p>10 (Recess taken.)</p> <p>11 THE VIDEOGRAPHER: We are back</p> <p>12 on the record. The time is 11:46 a.m.</p> <p>13 BY MR. MINTZER:</p> <p>14 Q. Mr. Favorito, have you ever</p> <p>15 observed Mr. Thomas interact with</p> <p>16 Ms. Browne-Sanders?</p> <p>17 A. Yes.</p> <p>18 Q. What was the context of those</p> <p>19 interactions?</p> <p>20 A. Casual conversations, passing</p> <p>21 in the hallway, wishing somebody good luck</p> <p>22 in a game. Those are the ones that I can</p> <p>23 recall off the top of my head.</p> <p>24 Q. Anything specifically about any</p> <p>25 of those interactions that stands out in</p>	<p>85</p> <p>1 FAVORITO</p> <p>2 Q. Did Mr. Thomas ever mention in</p> <p>3 your presence that -- strike that.</p> <p>4 Did Mr. Thomas ever say that a</p> <p>5 woman was attractive in your presence?</p> <p>6 A. I can't recall a specific</p> <p>7 incident.</p> <p>8 Q. Do you feel generally that he</p> <p>9 has said that, but you can't recall</p> <p>10 specifically?</p> <p>11 A. Yes.</p> <p>12 Q. Do you recall who it was in</p> <p>13 reference to?</p> <p>14 A. I can't think of anyone off the</p> <p>15 top of my head. No, I can't. I'm sorry.</p> <p>16 Q. Was it anyone who worked at</p> <p>17 Madison Square Garden?</p> <p>18 A. I can't recall.</p> <p>19 Q. Did you ever have a discussion</p> <p>20 with Mr. Thomas in which</p> <p>21 Ms. Browne-Sanders name came up?</p> <p>22 A. Yes.</p> <p>23 Q. Do you recall any such</p> <p>24 discussions?</p> <p>25 A. Numerous.</p>

22 (Pages 82 to 85)

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<p style="text-align: right;">86</p> <p>1 FAVORITO</p> <p>2 Q. Tell me what you recall.</p> <p>3 A. As I said, at the beginning my</p> <p>4 job was to try and help balance both sides</p> <p>5 for the time being. So Isiah, from the</p> <p>6 beginning, was very much on earning</p> <p>7 respect and figuring out how to work</p> <p>8 things out and giving people -- originally</p> <p>9 giving people the benefit of the doubt and</p> <p>10 seeing how people performed in terms of</p> <p>11 the level of professionalism.</p> <p>12 He specifically felt that</p> <p>13 Anucha's approach in a lot of ways was</p> <p>14 unprofessional and disorganized.</p> <p>15 Q. What did he say to you about</p> <p>16 that?</p> <p>17 A. That a lot of the things they</p> <p>18 were doing were disorganized.</p> <p>19 Q. Did he say what specifically?</p> <p>20 A. There were numerous instances</p> <p>21 over the course of several years, memos</p> <p>22 that had misspellings. He felt that</p> <p>23 sometimes that the basketball side wasn't</p> <p>24 pulled in on decisions, or decisions were</p> <p>25 made flippantly or haphazardly, whether</p>	<p style="text-align: right;">88</p> <p>1 FAVORITO</p> <p>2 understand why things weren't more</p> <p>3 organized.</p> <p>4 Q. And he made a comment about</p> <p>5 Ms. Browne-Sanders' lack of organization?</p> <p>6 A. That she is disorganized, yes.</p> <p>7 Q. Did Mr. Thomas ever make any</p> <p>8 other critical comments of</p> <p>9 Ms. Browne-Sanders in your presence?</p> <p>10 A. Not that I can recall.</p> <p>11 Q. Did he ever comment on</p> <p>12 whether -- strike that.</p> <p>13 Did he ever comment on their</p> <p>14 personal interactions?</p> <p>15 A. No.</p> <p>16 Q. Did he ever say that</p> <p>17 Ms. Browne-Sanders was friendly or not</p> <p>18 friendly or anything like that?</p> <p>19 A. No, not that I can recall.</p> <p>20 Q. In the conversations in which</p> <p>21 he had said the comments that you've</p> <p>22 testified to about Ms. Browne-Sanders</p> <p>23 being disorganized, did you say anything?</p> <p>24 A. No. My job was to make the</p> <p>25 peace.</p>
<p style="text-align: right;">87</p> <p>1 FAVORITO</p> <p>2 right or wrong.</p> <p>3 Scheduling of events, things</p> <p>4 along those lines, from a business</p> <p>5 perspective he felt a lot of times were</p> <p>6 not handled professionally.</p> <p>7 Q. But he was specifically</p> <p>8 critical of Ms. Browne-Sanders in those</p> <p>9 conversations?</p> <p>10 A. Not specifically Anucha. But</p> <p>11 since Anucha was the head of the</p> <p>12 department, a lot of it laid on her</p> <p>13 shoulders, I think.</p> <p>14 Q. Do you recall him ever making</p> <p>15 any specific comments in which he was</p> <p>16 critical of her?</p> <p>17 A. Critical in terms of being</p> <p>18 disorganized, yes.</p> <p>19 Q. What did he say about that?</p> <p>20 A. That she was disorganized, that</p> <p>21 it wasn't -- you know, I specifically</p> <p>22 remember a couple of times there were</p> <p>23 mistakes in memos or memos that weren't</p> <p>24 handed out to players in a timely fashion</p> <p>25 for an appearance. And Isiah couldn't</p>	<p style="text-align: right;">89</p> <p>1 FAVORITO</p> <p>2 Q. Was there not a peace?</p> <p>3 A. There was not a peace.</p> <p>4 Q. And how would you describe --</p> <p>5 in what ways was that manifested that</p> <p>6 there was not a peace?</p> <p>7 A. Just they were not on the same</p> <p>8 page. You know, Anucha had certain</p> <p>9 expectations about what the players should</p> <p>10 be doing. Isiah had his system as to the</p> <p>11 way he thought things should work. They</p> <p>12 were both very powerful personalities, and</p> <p>13 there were times when they clashed.</p> <p>14 Q. When did they clash, to your</p> <p>15 knowledge?</p> <p>16 A. I can't recall a specific</p> <p>17 instance. But I know Isiah over time</p> <p>18 became less and less involved on a</p> <p>19 day-to-day basis. He actually had Frank</p> <p>20 Murphy step in and kind of be the</p> <p>21 go-between for everything that went on on</p> <p>22 the basketball side.</p> <p>23 Q. Do you recall any instances,</p> <p>24 though, in which Mr. Thomas clashed with</p> <p>25 Ms. Browne-Sanders?</p>

23 (Pages 86 to 89)

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Exhibit 23

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

06 CV 0589 (GEL)

MADISON SQUARE GARDEN, L.P., ISIAH LORD
THOMAS, III and JAMES L. DOLAN,

Defendants.

-----X

VIDEOTAPED DEPOSITION OF FAYE BROWN

New York, New York

Wednesday, February 14, 2007

REPORTED BY:

BARBARA R. ZELTMAN

JOB NO. 11799



David Feldman
Worldwide

From File to Trial.

805 Third Avenue, 8th Floor
New York, NY 10022
(800) 642-1099

600 Anton Boulevard, 11th Floor
Costa Mesa, CA 92626
(866) DFW-1380

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1 FAYE BROWN
2 Q Did you on occasion observe
3 Mr. Murphy to joke with Ms. Browne
4 Sanders?
5 MR. MINTZER: Objection to
6 form.
7 A On those occasions?
8 Q On any occasion, did you
9 observe Mr. Murphy to joke with
10 Ms. Browne Sanders?
11 A Yes.
12 MR. MINTZER: Objection to
13 form.
14 Q And would you observe how she
15 would respond to those jokes?
16 A Well, Mr. Murphy always had,
17 like, a joke to tell or a story. So you
18 would just kind of just listen. But
19 yeah, would listen.
20 Q Would she laugh? On occasion,
21 would she laugh?
22 MR. MINTZER: Objection to
23 form.
24 Q On occasion, did she laugh?
25 MR. MINTZER: Objection to

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1 FAYE BROWN
2 form.
3 A On occasion, yeah.
4 Q Did Ms. Browne Sanders tell you
5 that Mr. Thomas had used profanity when
6 he spoke with her?
7 A Did she tell me this?
8 Q Yes.
9 A Yes.
10 Q And when was the first time
11 that she told you that Mr. Thomas had
12 used profanity with her?
13 A I believe it was probably,
14 like, the second meeting that they had
15 together, the bi-monthly one.
16 Q And where did Ms. Browne
17 Sanders tell you this?
18 A In the office.
19 Q In her office?
20 A Yes.
21 Q And what did she say to you and
22 what did you say to her in this
23 conversation?
24 A She just told me basically that
25 he was -- he cursed at her and it just

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1 FAYE BROWN
2 wasn't professional.
3 Q And what did you say?
4 A And she was shocked.
5 Q And what did you say, if
6 anything?
7 A I was like, "Really? Man."
8 Q And did she tell you the curse
9 words that he used?
10 A In that particular time or
11 throughout?
12 Q Asking you only about the first
13 conversation.
14 A The first conversation,
15 F-U-C-K.
16 Q Any other words that you would
17 regard as curse words that she told you
18 Isiah Thomas used in this conversation?
19 A In that initial conversation?
20 Q Yes.
21 A No.
22 Q Did she tell you anything else
23 about the conversation that she and
24 Mr. Thomas had where he used the word
25 "fuck"?

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1 FAYE BROWN
2 MR. HERNSTADT: Can you read
3 that back, please.
4 (Requested portion of record
5 read: "Q. Did she tell you
6 anything else about the
7 conversation that she and
8 Mr. Thomas had where he used the
9 word "fuck"?")
10 (End of read-back.)
11 MR. HERNSTADT: Any
12 conversation, or the one she's been
13 testifying about?
14 Q Just so we're clear, we are
15 only on that initial conversation.
16 So in that initial conversation
17 where she said to you he used the word
18 "fuck," did she tell you anything further
19 about that conversation that she had with
20 Mr. Thomas?
21 A Yes. Yeah.
22 Q What else did she say to you?
23 A Basically what he told her.
24 Q And what is it that she told
25 you that he told her?

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FAYE BROWN

A That he was, like, "who the F are you and what is your F'ing position here?"

Q And did she say how she responded, if at all to Mr. Thomas?

A Well, in terms of yeah, she told him that if -- basically, if he needs to find about what she does, like in detail, then she would probably have -- probably needs to go to Steve Mills to clarify.

Q And this is all things that she told you in that initial conversation?

A Yes.

Q And did you understand --

A Because she was taken back a little bit, so ...

Q Did you come to have an understanding that basketball operations and business operations, that there was some question about their respective roles?

MR. MINTZER: Objection to form.

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FAYE BROWN

MR. HERNSTADT: Objection to form.

A Their positions? Their job description?

Q Strike that question.

Did you come to an understanding that Mr. Thomas had a question about what Ms. Browne Sanders' role was at Madison Square Garden, in terms of what she did for her job?

MR. MINTZER: Objection to form.

MR. HERNSTADT: Objection to form.

A Well, it seemed like he wasn't clear.

Q He wasn't clear in terms of what her job duties were?

A All of her job duties, right.

Q And how did you come to have that understanding?

A Because, yeah, that's what she communicated, you know. That she oversaw all of the business operations, and it

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FAYE BROWN

was just like, like, he said to her like -- this is what she said to me. He said, "I'm the F'ing president, so I don't understand, you know, where do you come in," like, that kind of attitude.

Q And when she told you that Isiah Thomas said, "I'm the F'ing president, I don't understand what you do," is this still in this initial conversation we were speaking about?

A Yes.

Q But did you ever speak with Ms. Browne Sanders about Mr. Thomas wanting to keep basketball operations separate from business operations?

MR. MINTZER: Objection to form.

MR. CESARATTO: Could you read it back.

(Requested portion of record read: "Q. But did you ever speak with Ms. Browne Sanders about Mr. Thomas wanting to keep basketball operations separate from business

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FAYE BROWN

operations?")

(End of read-back.)

A No, I didn't talk to her about that.

Q Have you told us everything that Ms. Browne Sanders said to you in this initial conversation?

A I think there was more, but I don't remember at this time.

Q Did Ms. Browne Sanders -- strike that question.

Did there come another time where Ms. Browne Sanders told you that Mr. Thomas had used profanity with her?

A Yes.

Q And when was the next time that she told you this?

A I believe it was the following meeting.

Q And where did she tell you this?

A In her office.

Q And what did she say to you and what did you say to her during this

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1 FAYE BROWN

2 conversation?

3 A What did she say to me? I
4 think it got worse because she said
5 something like he said -- something about
6 "F'ing B-I-T-C-H," because she said she
7 was going to go to Steve because it seems
8 like he's not working with her, like, in
9 terms of, I guess, being -- in terms of
10 methods of management or something. I
11 don't know. Like, he wasn't being very
12 cooperative. And that's it. Yeah.

13 Q And what did you say to her, if
14 anything, in this second conversation?

15 A Well, I was still, like,
16 shocked, like, "What? Nah. You serious?
17 No. That's unacceptable. No, you have
18 to say something to your supervisor,
19 Steve, someone, because it's just not a
20 part of Madison Square Garden policy."

21 Q What, if anything, did
22 Ms. Browne Sanders say after you said
23 that she should tell Steve or her
24 supervisor that it's not part of Madison
25 Square Garden policy?

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1 FAYE BROWN

2 MR. MINTZER: Objection to
3 form.

4 A Say that again.

5 Q After you said that, what did
6 Ms. Browne Sanders say, if anything?

7 A She was just shocked the fact
8 that he was, you know, Isiah Thomas and
9 she was just shocked in the kind of
10 behavior, threw her off a little bit.
11 And say, okay, this is what I'm dealing
12 with, this is what's going on, and how is
13 the best way to deal with this.

14 Q And these are all things she's
15 saying to you in this conversation?

16 A Yeah, like, how do I -- you
17 know. I understand there's a policy, but
18 you know, you want to give people the
19 benefit of the doubt. But you know, it
20 was out of hand. And actually, she was
21 crying at that point.

22 Q She was crying when she spoke
23 to you?

24 A Yeah.

25 Q Was anyone else other than you

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1 FAYE BROWN

2 and her in this conversation?

3 A At the time, it was just me and
4 her.

5 Q Did anybody else come into the
6 conversation?

7 A In that conversation?

8 Q This is we're talking about the
9 second conversation.

10 A Okay. No, no.

11 Q Did you tell anybody at any
12 point about this second conversation you
13 had with Ms. Browne Sanders?

14 A Telling anyone what?

15 Q Tell anyone at work.

16 A No.

17 Q Did you tell Michelle Quendo?

18 A Michelle Quendo?

19 Q Yes.

20 A No.

21 Q Did you tell Raquel Burnette?

22 A No.

23 Q Did you tell any of your
24 friends at work about this?

25 A No.

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1 FAYE BROWN

2 Q What about the first
3 conversation, did you tell any of your
4 friends at work about that conversation
5 with Ms. Browne Sanders?

6 A No, not that I can remember.

7 Q So it's your testimony that you
8 kept these two conversations just between
9 yourself and Ms. Browne Sanders?

10 A It was confidential, yeah.

11 Yes.

12 I think she was a little
13 shocked because it was disrespectful. I
14 think that's why she was crying because
15 it was disrespectful.

16 Q Did there come any point in
17 time after the second conversation where
18 you and she again discussed Mr. Thomas
19 using profanity with her?

20 A In the second conversation?

21 Q After the second conversation.

22 A Yes.

23 Q And when was the next time the
24 two of you discussed Mr. Thomas'
25 profanity?

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FAYE BROWN

A I am not sure. I think probably, like, the following month or something.

Q And where did that conversation take place?

A In her office.

Q And what did she say to you during that conversation?

A That he was using profanity, using the F word.

Q Did Ms. Browne Sanders say he used any profanity other than the word "fuck"?

A In this other meeting? No.

Q We are talking about the third conversation the two of you had now?

A Right. No.

Q What did she tell you, if anything, other than the fact -- other than the Mr. Thomas using the word "fuck"?

A Nothing. She just said that she's being professional about the situation. She understands that, you

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FAYE BROWN

know, in terms of relationship building was very important, you know, to her. So she was just trying to work with it, but it just got out of hand.

Q So is that words that she used, "get out of hand"?

A No. I'm using it.

Q I'm asking you what you remember her saying to you.

A Okay.

Q So what do you remember her saying to you in this third conversation?

A That she's trying to work. She's trying to put it aside and be professional and get their job done, you know.

Q Was anyone else other than the two of you present in this third conversation?

A I think Karen Buchholz was in a meeting with us. I don't know if it's this one. But I know she was in with us at some point.

Q So you believe that Karen

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FAYE BROWN

Buchholz was present during a conversation with Ms. Browne Sanders where Mr. Thomas -- where Ms. Browne Sanders said Mr. Thomas had used profanity?

A Yes.

Q But you are not sure it was this third conversation or not?

A Right, right.

Q And what, if anything, did you say to her after she told you this in this third conversation?

A I was just, like, "no way," like, you know, "wow," you know. I don't know, I guess my whole thing was, you know, you give someone the benefit of the doubt, but if it's something that -- and she basically said, "I've told him do not talk to me like that, it's just not appropriate." So she told him, and he just continued. So what do you do. That was my question. What do you do when someone is not really listening.

Q And did you suggest she do

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FAYE BROWN

anything?

A I said, "What do you think?" And I kind of gave the question back to her, "What do you think you should do?"

Q And what did she say?

A She went to Steve Mills.

Q So at some point she told you she went to Steve Mills?

A Yes.

MR. MINTZER: Objection to form.

Q And what did she tell you about going to Steve Mills?

A She went to Steve Mills and explained to him what happened.

Q I'm asking you now, I'm asking you what she told you.

So to the best of your memory, what do you remember she telling you about her going to Steve Mills about Isiah Thomas?

A She told me everything that I told you.

Q And what was that?

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FAYE BROWN

What it that she told you?

A About him cursing at her, F-U-C-K, the B-I-T-C-H, you know, "what is this, I'm the president, what's going on?" And basically she approached him with that and said, you know, probably in terms of clarifying what each job description is, because it seems like in terms of if we're going to work together, you know, it has to be things that are communicated and made clear so that there can be some kind of unit.

Q Did she tell you that she told Mr. Mills that Isiah Thomas used the word "fuck"?

Did she tell you that?

A Yes, yes.

Q Did she tell you that she told Mr. Mills that Isiah Thomas used the word "bitch"?

MR. MINTZER: Asked and answered.

You can answer it again.

A Sorry.

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FAYE BROWN

Q Did she tell you, did

Ms. Browne Sanders tell you that she told Steve Mills that Isiah Thomas had called her a "bitch"?

A Yes. And profanity. She used that word too, "profanity."

Q Did she tell you what, if anything, Steve Mills said after she told him this?

MR. HERNSTADT: What Steve Mills said to --

Q What Steve Mills said to Ms. Browne Sanders.

A Well, he listened to what she said. And then, I think, a couple days later, he started the -- the meeting that Anucha had with Isiah, Steve kind of oversaw that. So now it was just, like, okay, let's meet altogether, Steve, Isiah Thomas and Anucha, and let's try to talk.

Q Did Ms. Browne Sanders tell you about that meeting with Mr. Thomas, Mr. Mills and herself?

A Yes, she did.

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FAYE BROWN

Q And when did she tell you that?

When did she tell you about that meeting?

A The same day.

Q Same day of the meeting?

A Yes.

Q And when was that?

A I am not sure. I am not sure about the time. Let me think.

I'm wondering if it's, like, in the summertime. I am not sure.

MR. HERNSTADT: Again, he is not asking you to speculate.

THE WITNESS: Okay. All right.

Q And what did Ms. Browne Sanders tell you was said in that meeting?

A Basically that Steve kind of explained what her role was and explained what his role was, and kind of just saying, you know, we want to come to, like, a common place, common ground. And then she told me he had to take a call, so he left where they were meeting. And that's when he started, like, cursing at

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FAYE BROWN

her again.

Q Did she say what words he used?

A F word.

MR. HERNSTADT: Can we be clear who the "he" is here?

THE WITNESS: Isiah.

Q It's Isiah Thomas you are saying she told you that Isiah Thomas started cursing at her?

A Right.

Q Not Steve Mills?

A Right.

Q And what words did she say Isiah Thomas used?

A The F word.

Q The word "fuck"?

A Yes.

Q Did she tell you anything else about this meeting?

A Yes. She said that, I think when Steve came back, she said that she stated that, you know, she's played on the courtyard, like. Like, she's played street ball. So she's not the type of

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1 FAYE BROWN
2 person to just cry if something goes
3 wrong, but she will not tolerate this
4 disrespect and this basic -- like a
5 playground. Because she said when Steve
6 left, it was all of a sudden he just
7 started again. So it was, like, what was
8 going on. Inappropriate.

9 Q Did she tell you what, if
10 anything, Steve Mills said after she
11 said, you know, she's not going to
12 tolerate this disrespect, she's played
13 street ball?

14 A Right. And from that ball --
15 What did you say?

16 Q What did Mr. Mills say, if
17 anything, after that, according to
18 Ms. Sanders?

19 A Basically he just kept the
20 meeting, like, him, Isiah and Anucha. It
21 wasn't no longer Isiah and Anucha
22 anymore. It was he was going to be there
23 to moderate and he was going to be, like,
24 the common ground that they could both
25 meet and talk and try to work it out or

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1 FAYE BROWN
2 something, work out some kind of ...
3 Q And Ms. Browne Sanders told you
4 all of this?

5 A Yes.

6 Q You weren't at that meeting,
7 correct?

8 A No.

9 Q I believe you've told me about,
10 I guess, four or five different
11 conversations where Ms. Browne Sanders
12 has told you that Mr. Thomas used
13 profanity with her?

14 A Yes.

15 Q Are there any other
16 conversations that you've had with
17 Ms. Browne Sanders where she's told you
18 that Mr. Thomas used profanity?

19 A I think it was probably once or
20 twice after that, and that's when --
21 okay. Yeah.

22 Q There were one or two more
23 conversations after that.

24 What did Ms. Browne Sanders say
25 in those conversations?

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1 FAYE BROWN
2 Let's start with the first one
3 you remember.

4 A I don't remember. I don't
5 remember that off the top of my head.

6 Q You don't remember what she
7 said?

8 A Oh, yes, I remember she saying
9 she was telling him -- no, this is after
10 the Steve meeting, after the Steve
11 meeting. They really didn't have
12 meetings alone together after that.

13 Q So after you and she spoke
14 about the Steve meeting, were there any
15 other conversations that you had with
16 Ms. Browne Sanders where she told you
17 that Mr. Thomas had used profanity with
18 her?

19 MR. MINTZER: Asked and
20 answered.

21 The question had been asked
22 and answered, but you could answer
23 it again.

24 A I don't remember right now.

25 Q Did Ms. Browne Sanders ever

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1 FAYE BROWN
2 tell you that she was documenting
3 Mr. Thomas' use of profanity with her?

4 MR. HERNSTADT: Objection to
5 form.

6 MR. MINTZER: Objection to
7 form.

8 A Well, she has a book that she
9 puts all her information on. So in terms
10 of documenting, I am not sure what you
11 mean.

12 MR. HERNSTADT: Could you
13 read back the question, please.

14 (Requested portion of record
15 read: "Q. Did Ms. Browne Sanders
16 ever tell you that she was
17 documenting Mr. Thomas' use of
18 profanity with her?")

19 (End of read-back.)

20 A Yes.

21 Q And what did she tell you
22 about -- strike that question.

23 Did she tell you where she was
24 documenting his use of profanity?

25 MR. HERNSTADT: Objection to

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1 FAYE BROWN
2 form.
3 MR. MINTZER: Objection to
4 form.
5 A No, she didn't tell me where.
6 Q Did she tell you how she was
7 documenting his use of profanity?
8 A Well, the thing is that, like,
9 she has a journal that she writes
10 everything in it. So it's just her
11 habit. She does that regularly. So it's
12 just like, even if the conversation that
13 stuck out, she would write it down,
14 whether it was positive or negative, she
15 would write it down. And that's my
16 common knowledge about that.
17 Q So did she tell you she was
18 writing down what Isiah Thomas had said
19 to her into her journal?
20 MR. MINTZER: Objection to
21 form.
22 A I don't remember her telling
23 me.
24 Q But was it your understanding
25 that when she used the word
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1 FAYE BROWN
2 "documenting," that she was writing it
3 down in her journal?
4 MR. HERNSTADT: Objection to
5 form. Misstates the testimony.
6 MR. MINTZER: Objection to
7 form. Mischaracterizing the
8 testimony.
9 Q Was that your understanding?
10 MR. SCHOENFELD: He's just
11 asking the question.
12 MR. MINTZER: He's putting
13 words in her mouth.
14 MR. CESARATTO: Excuse me.
15 MR. MINTZER: If he's going
16 to comment, he's going to get a
17 reply.
18 Continue, Counsel.
19 Q Let's just go back.
20 Was it your understanding that
21 when Ms. Browne Sanders said she was
22 documenting Mr. Thomas' use --
23 A She didn't say "document," like
24 she's documenting what Mr. Thomas was
25 telling her.
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1 FAYE BROWN
2 Q What words did she use?
3 MR. HERNSTADT: If any.
4 A Yeah. Like, basically it was
5 important to just write things down.
6 Q But did she tell you she was
7 writing things down in connection with
8 the profanity Mr. Thomas was using
9 towards her?
10 A No, I don't know.
11 MR. MINTZER: Objection to
12 form.
13 Q Have you ever seen Ms. Browne
14 Sanders' journal?
15 A Yes.
16 Q Did you ever read any part of
17 it?
18 A Sometimes.
19 Q On what occasions would you
20 read it?
21 MR. HERNSTADT: Objection to
22 form.
23 A Whether she forgot a number and
24 she just asked me to go in the book and
25 find out the person's number or their
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1 FAYE BROWN
2 address or -- I realized she's very
3 detailed. That's the type of woman that
4 she is. So whether it was a specific
5 statement or something that she needed to
6 remember, like, in terms that's how I
7 would read it.
8 Q And what things, to your
9 knowledge, did she write into her
10 journal?
11 MR. MINTZER: Objection to
12 form.
13 MR. HERNSTADT: Objection to
14 form.
15 You are asking what she
16 read?
17 MR. CESARATTO: I'm asking
18 what her knowledge is, whether she
19 read it or saw Ms. Sanders writing
20 it down.
21 A Writing what down?
22 Q Writing things into her
23 journal.
24 A Oh, yes.
25 Q What types of things did she
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<p style="text-align: right;">178</p> <p>1 FAYE BROWN 2 write into her journal? 3 MR. HERNSTADT: Objection to 4 form. 5 MR. MINTZER: Objection to 6 form. 7 A Schedules, telephone numbers. 8 Her thoughts. What she thought about a 9 situation. Her conversations with 10 people. What stood out to her in that 11 day. Good pointers, tips that she needs 12 to remember. 13 Q And did she ever tell you why 14 she wrote these things in her journal? 15 A Well, it's important. It 16 was -- it's ever since I knew her and 17 worked for her, she wrote everything down 18 in her journal. Because she wants to 19 make sure she doesn't forget anything. 20 That she's organized. 21 Q Did you ever see any e-mails 22 where Mr. Thomas' use of profanity was 23 mentioned? 24 A No, I didn't see any e-mails -- 25 no, I don't recall. I don't remember DAVID FELDMAN WORLDWIDE, INC. 805 Third Avenue, New York, New York 10022 (212)705-8585</p>	<p style="text-align: right;">180</p> <p>1 FAYE BROWN 2 A Yes. 3 Q And what did she say to you in 4 this conversation? 5 A She said that he said to her 6 that, "Oh, now I know why there's tension 7 between us" and "it's like love and 8 basketball," you know, "I'm in love with 9 you. That's what it is." 10 Q Did she say anything else? 11 A She was, like, "First he's 12 cursing and now he's in love." Like 13 "What's going on?" Like that. She was 14 like, "This is just inappropriate, 15 period." 16 Q Was she laughing it off with 17 you? 18 A What? 19 Q Was she laughing it off? 20 MR. MINTZER: Objection to 21 form. 22 A Laughing it off? 23 Q Yeah. 24 A No. 25 Q Was she laughing about it? DAVID FELDMAN WORLDWIDE, INC. 805 Third Avenue, New York, New York 10022 (212)705-8585</p>
<p style="text-align: right;">179</p> <p>1 FAYE BROWN 2 right now. 3 Q Did Ms. Sanders ever tell you 4 that Mr. Thomas had used the word "love" 5 in speaking with her? 6 A Yes. 7 Q When was the first time she 8 told you that? 9 A In January. 10 Q January of what year? 11 A 2005. 12 Q Why do you remember it was in 13 January 2005? 14 A Because it was closer to the 15 Christmas party. 16 Q You are talking about Christmas 17 party where you observed Ms. Sanders and 18 Mr. Thomas play Horse? 19 A Right. 20 Q And where did she tell you -- 21 where did you have this conversation with 22 Ms. Browne Sanders where she said 23 Mr. Thomas had used the word "love"? 24 A I think in her office. 25 Q In her office? DAVID FELDMAN WORLDWIDE, INC. 805 Third Avenue, New York, New York 10022 (212)705-8585</p>	<p style="text-align: right;">181</p> <p>1 FAYE BROWN 2 A No. I'm laughing. 3 Q Was she laughing about it at 4 the time she told you? 5 A No. 6 Q What, if anything, did you say 7 to her? 8 A And then I told her about the 9 situation in December. That's when I 10 told her because it was like a 11 confirmation that, whoa, okay, it's 12 probably true, because it was true. 13 Q And what did you tell her you 14 saw? 15 A I told her I saw him flirting 16 or just looking at her up and down, like, 17 "I want you," you know, kind of flirting. 18 You know when somebody is flirting at 19 you, looking at her body. 20 Q And what did she say? 21 A And she was just like "What? 22 See? What is going on? This is 23 outrageous." 24 Q Did she tell you what her 25 response to Mr. Thomas was when he said DAVID FELDMAN WORLDWIDE, INC. 805 Third Avenue, New York, New York 10022 (212)705-8585</p>

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1 **FAYE BROWN**
 2 "I'm in love with you. This is like love
 3 and basketball"? '
 4 **MR. MINTZER:** Objection to
 5 form.
 6 You can answer.
 7 A She just said, "You need to
 8 stop doing this. You need to just" --
 9 she brought it back to a professional
 10 level.
 11 Q Did she tell you that she told
 12 Steve Mills about it?
 13 A Yes.
 14 Q When did she tell you that she
 15 told Steve Mills?
 16 A This was after my meeting, my
 17 conversation in January.
 18 Q So you had this conversation in
 19 January where she tells you about this
 20 comment about love and basketball?
 21 A Right.
 22 Q And then you have a subsequent
 23 conversation with Ms. Browne Sanders
 24 where she says she told Steve Mills about
 25 Mr. Thomas?

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1 **FAYE BROWN**
 2 **MR. HERNSTADT:** Objection to
 3 form.
 4 A Yeah. In terms of policy and
 5 procedure, it's something that she has to
 6 do. She has to tell her supervisor about
 7 the situation, even though, you know, he
 8 has a lot on his plate, there's lot going
 9 on in the Garden, people are trying to do
 10 their jobs. But this is something that
 11 has to be addressed because, you know, if
 12 it's not, that's not the Garden policy.
 13 Q But my question is: Did she
 14 tell you that she actually spoke to Steve
 15 Mills about the love and basketball
 16 conversation?
 17 A Yes.
 18 **MR. MINTZER:** Asked and
 19 answered.
 20 A She did.
 21 Q And what did she say about
 22 that?
 23 **MR. HERNSTADT:** Objection.
 24 Go ahead.
 25 Q What did she say about her

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1 **FAYE BROWN**
 2 conversation with Mr. Mills?
 3 A She just explained to him what
 4 happened.
 5 Q And what did she tell you she
 6 explained to Mr. Mills?
 7 A What I told you about, about
 8 the love and basketball and that he said
 9 "he's in love with me" and that's why he
 10 understands the root why there's tension
 11 between them.
 12 Q So Ms. Browne Sanders told you
 13 that she told Mr. Mills what exactly what
 14 Mr. Thomas said to her?
 15 A Right. And I believe she sent
 16 an e-mail to him.
 17 Q And why do you believe that?
 18 A Because she did.
 19 Q And when you say "e-mail to
 20 him," you mean e-mail to whom?
 21 A To Steve Mills.
 22 Q Did you see this e-mail?
 23 A Yes.
 24 Q When did you see it?
 25 A Before she sent it.

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1 **FAYE BROWN**
 2 Q How did you come to see it?
 3 A Well, she just asked me in
 4 terms of, you know, she didn't want to
 5 seem -- she didn't want to add any
 6 pressure to him because she respected
 7 Steve a lot. So she didn't want to add,
 8 like, "Oh, gosh what do you want now,"
 9 like that kind of attitude. She wanted
 10 to present it to him where she didn't
 11 want to be overbearing. She wanted to do
 12 it in the best professional way. So she
 13 just asked me to document and read, does
 14 this sound like -- how does this sound.
 15 Q And where did you read it?
 16 A I read it in her office.
 17 Q On her computer monitor?
 18 A Yes.
 19 Q Was she present while you read
 20 it?
 21 A Yes.
 22 Q And what did it say?
 23 A Oh, I don't remember all of it
 24 now, but just basically, "Steve, I would
 25 like to have a meeting with you

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Exhibit 24

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ANUCHA BROWNE SANDERS,

Plaintiff,

-against-

MADISON SQUARE GARDEN, L.P.,
ISIAH LORD THOMAS III AND JAMES L.
DOLAN,


Defendants.

Civil Case No. 06 Civ. 0589 (GEL)

ECF CASE

**DECLARATION OF
JONATHAN SCHINDEL, ESQ.**

JONATHAN SCHINDEL, ESQ., pursuant to 28 U.S.C. § 1746, declares:

1. I have personal knowledge of the facts set forth in this Declaration.
 2. I am a season ticket holder of the New York Knicks and make this Declaration in order to state what I observed and heard during an open practice held by the Knicks on October 30, 2005.
 3. I attended the open practice with my wife and two children. A friend of mine, with whom I share season tickets, Robert Levy, also attended the practice.
 4. At the practice, Knicks coach Larry Brown had the team do some drills and scrimmage with each other. The event lasted about an hour and a half.
 5. During the event, I sat with my family next to the area where players enter the arena.
 6. While seated, I saw Isiah Thomas standing about a foot from my seat along with two other people. One of those people was a short, overweight, older gray-haired gentlemen. I am not sure who he was although he did look familiar to me. The other person was a woman who I later learned from press reports was Anucha Browne Sanders.
- 

7. I observed that the three of them stood very close together talking and watching the practice. To the best of my recollection, they were together for approximately half the practice.

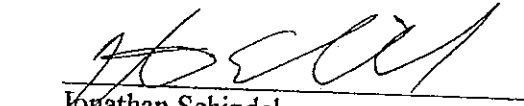
8. On several occasions during the practice, someone new would approach Thomas and speak with him. Sometimes he would introduce the person to Ms. Browne Sanders.

9. During the introductions of Ms. Browne Sanders, he occasionally would place his hand on her arm and comment on her in various ways including comments like "She's so attractive," "She's so beautiful," "I can't concentrate on my work when she's around," and "She's easy on the eyes."

10. As Thomas made these introductions, he appeared to be playing the role of the host of the event and Ms. Browne Sanders did not appear to object. She was smiling during the introductions. She stood by his side and she did not appear to me to be offended or upset. I did not notice her moving away from him or trying to otherwise physically separate herself from him.

11. Months later, when I read about the lawsuit in the newspaper, I recognized Ms. Browne Sanders from her picture in the paper as the woman that I had seen with Thomas during the open practice.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 23, 2007.


Jonathan Schindel

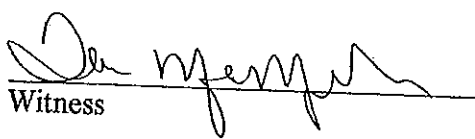

Witness

Exhibit 25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- x
ANUCHA BROWNE SANDERS,

Plaintiff,

- against -

MADISON SQUARE GARDEN, L.P., ISIAH LORD
THOMAS III AND JAMES L. DOLAN,

Defendants.
----- x

06 Civ. 00589 (GEL) (DCF)

DECLARATION OF
MARC SCHOENFELD,
ESQ.

Marc Schoenfeld, Esq. declares under penalty of perjury:

1. I am Senior Vice President, Legal and Business Affairs for Madison Square Garden, L.P. ("MSG"), and I submit this declaration in support of MSG's application for return of five emails containing attorney-client privileged communications and attorney work product inadvertently produced to Plaintiff.
2. In the time period December 2005 and January 2006, I was one of two Senior Vice Presidents managing the MSG legal department and acting as General Counsel for the areas under my responsibility, including MSG's sports teams and labor and employment issues.
3. On or about December 20, 2005, Plaintiff's counsel stated to me on the telephone that Plaintiff had a "knock down" sexual harassment suit.
4. On December 22, 2005, MSG's primary outside employment counsel, Christopher Reynolds, Esq., and I met with Plaintiff's counsel, at which Plaintiff's allegations were discussed. It is my understanding that Plaintiff's counsel stated to Mr. Reynolds in substance that MSG had to pay in order to teach them a lesson.

5. On December 27, 2005, Plaintiff's counsel demanded \$6.5 million in return for a release and Plaintiff's resignation.

6. In or about the last week of December 2005, Plaintiff's counsel reduced Plaintiff's demand to \$5,950,000 million.

7. Immediately upon MSG's learning of Plaintiff's allegations through her counsel, MSG assigned John Moran, MSG's Vice President of Employee and Labor Relations, and Rochelle Noel, Esq., an in-house employment lawyer at Cablevision, MSG's parent company, to conduct an internal investigation.

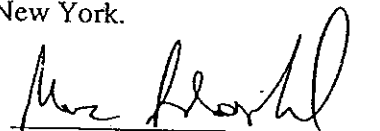
8. I communicated with the investigators to convey Plaintiff's complaint as outlined to me by Plaintiff's counsel in the December 22, 2005 meeting.

9. While the internal investigation was going on, my role was to coordinate MSG's defense of the litigation that Plaintiff's counsel had threatened by communicating with the investigators concerning Plaintiff's claims and the progress of their investigation; coordinating with outside employment counsel, the company human resources and legal personnel not involved in the investigation, and senior management; and providing legal advice.

10. During the course of the investigation, various emails were sent to me for purpose of my providing legal advice and to keep me apprised of the investigation given my role in coordinating MSG's defense.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on March 2, 2007, in New York, New York.


MARC SCHOENFELD, ESQ.